

December 20, 2024

By CM/ECF

Hon. Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Courtroom 4F
Brooklyn, New York 11201

Re: *PleasrDAO v. Shkreli*, Case No. 1:24-cv-04126 – Request to Extend Deadlines

Dear Judge Chen:

We represent Plaintiff PleasrDAO in the above-referenced action. We write, with the consent of Defendant Martin Shkreli, and pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice, to respectfully request a mutual extension of deadlines set forth in the Court's November 20, 2024 Order and December 10, 2024 Order.

Under the December 10 Order, today is Plaintiff's deadline to file the materials identified in the Court's November 20, 2024 Order necessary for Plaintiff to pursue its contempt motions, including (1) a letter in support of its contempt motions "identifying the specific ways in which it believes Defendant is still in contempt of the Court's Preliminary Injunction Order;" (2) "a list of Plaintiff's exhibits with dated descriptions from the November 20, 2024 hearing;" and (3) "a list of requested additional searches, if any, for Defendant to conduct" (collectively, the "Contempt Motion Materials"). Similarly, Defendant must file a reply, along with a comprehensive list of every person the Defendant may have distributed any or all tracks of the Album to, with contact information for those individuals (the "Distribution List"), by January 8, 2025.

The Parties continue to meet and confer regarding the completeness of the searches that Defendant has conducted at Plaintiff's request. Plaintiff received a response from Defendant just last night and need time to review it.

Accordingly, the Parties request an extension of Plaintiff's deadline to file the Contempt Motion Materials until January 8, 2025 and Defendant's deadline to file a reply and the Distribution List by January 15, 2025. Plaintiff and Defendant also reserve their rights to request fees and costs associated with the contempt proceedings, until after the Parties have finally resolved the issue of the completeness of Defendant's sworn statement, filed pursuant to the August 26, 2024 Preliminary Injunction Order.

This is the second time the Parties have requested an extension of time for Plaintiff's deadlines, and the first time the Parties have requested an extension of Defendant's deadline under these orders. The extension will not impact any other deadlines set by the Court for this matter.

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We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ Steven Cooper
Steven Cooper

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